



State of California
Respiratory Care Board
444 North 3rd Street, Suite 270
Sacramento, CA 95814
Telephone (916) 323-9983
Fax (916) 323-9999
www.rcb.ca.gov



February 21, 2003

Inquiry: My PFT tech. has a CPFT but is not a licensed RCP. Is this a new requirement? I had this reviewed in 1998 and he was not required to have a license at that time. Please advise if there are new requirements. Supporting documents are attached for your reference.

Response: Section 3702 describes the practice of Respiratory Care as therapy, management, rehabilitation, diagnostic evaluation, and care of patients with deficiencies and abnormalities that affect the pulmonary system. Based upon that statement I would include Pulmonary Function Testing in the category of a diagnostic evaluation. We would therefore conclude that these functions require a licensed practitioner to perform them. Having said that, I will tell you that the Board has recently developed a task force to further review this issue and those associated with sleep studies and home care. It is our intent to clarify these functions within the Practice Act to ensure the appropriately trained individuals provide these services to ensure public safety.

Reference # 2002-C-41

This determination does not constitute a declaratory decision under the comprehensive provisions of Government Code sections 11465.10 - 11465.70.